Message

From: Jason Renzaglia [Jason.Renzaglia@erg.com]

Sent: 10/21/2021 4:05:30 PM

To: Bouchard, Andrew [Bouchard.Andrew@epa.gov]
CC: Jason Renzaglia [Jason.Renzaglia@erg.com]

Subject: Potential CBI Questions

Attachments: Potential CBI Questions_Chemical Manufacturing Section 114 Component I.docx

Andrew,

I've attached a file that identifies questions where I think facilities might be able to claim their response as CBI. See each bubble comment in the file. There are not many, but in some cases, I am not sure and definitely need your feedback on all of these.

Here's what I am thinking we could do:

- Mark/highlight the question in the Excel response template.
- Include instruction that reads something like: "The EPA has identified only a few questions in Component I where a facility may choose to claim their response as CBI. In other words, the EPA has determined that these few questions are the only questions in Component I where the facility can make a CBI claim. These few questions are identified in the response template with green highlight and a footnote. The EPA has determined that facility responses to all other questions in the response template cannot be withheld from disclosure as confidential. Refer to Enclosures 3 and 5 for our rationale for this determination."

Thoughts?

Thanks, Jason